

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**BRANDON SALUS, and ALAN FELIX
IPANAQUE CORDOVA, on behalf of
themselves and others similarly situated,**

INDEX NO: 07cv03142-GBD-DCF

Plaintiffs,

**FLSA COLLECTIVE ACTION AND
RULE 23 CLASS ACTION**

v.

**TSE GROUP LLC d/b/a B.B. KING BLUES
CLUB AND GRILL and TSION BENSUSAN**

Defendants.


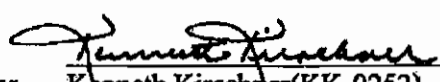
STIPULATION TO AMEND COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties in the above captioned action, that

- a. Plaintiffs may file and serve the attached Second Amended Complaint in the above-captioned matter.
- b. Defendants' undersigned counsel is authorized to accept service by regular mail for all named Defendants.

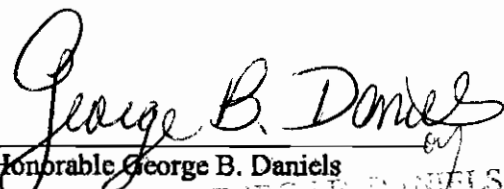
c. Defendants shall have thirty (30) days from service of the Second Amended Complaint to answer, move or otherwise respond thereto.

Dated: New York, New York
May 16, 2007

<p>JOSEPH & HERZFELD LLP</p> <p>By:  D. Maimon Kirschenbaum (DK-2338) Charles E. Joseph (CJ-9442)</p> <p>757 Third Avenue, 25th Floor New York, New York 10017 (212) 688-5640 (212) 688-2548 (fax)</p> <p><i>Attorneys for Plaintiffs, the FLSA Collective Plaintiffs and the proposed Class</i></p>	<p>HELLER EHRMAN LLP</p> <p>By:  Kenneth Kirschner (KK-0252) Eric D. Raphan (ER-8339)</p> <p>Times Square Tower 7 Times Square New York, NY 10036 (212) 832-8300 (212) 763-7600 (fax)</p> <p><i>Attorneys for Defendants</i></p>
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MAY 31 2007

SO ORDERED:


Honorable George B. Daniels
GEORGE B. DANIELS